

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket No. 1507

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF MICHAEL
PRENDERGAST, JEFFREY DWYER, ROBERT WILL, CHRISTOPHER DITULLIO,
HEATHER HOLODY, MICHAEL KENNEDY, AND MELISSA BOWERS FOR RELIEF
FROM THE AUTOMATIC STAY, TO THE EXTENT APPLICABLE, TO ALLOW
PAYMENT AND/OR ADVANCEMENT OF DEFENSE COSTS AND RELATED
EXPENSES UNDER INSURANCE POLICY**

Jody C. Barillare, as counsel to Michael Prendergast and Jeffrey Dwyer, hereby certifies as follows:

1. On July 31, 2025, Michael Prendergast, Jeffrey Dwyer, Robert Will, Christopher Ditullio, Heather Holody, Michael Kennedy, and Melissa Powers (together, the “Movants”) moved for entry of an order modifying the automatic stay under 11 U.S.C. § 362 (the “Automatic Stay”), to the extent the Automatic Stay applies, to permit the Federal Insurance Company (“Chubb”) to advance and/or pay proceeds (the “Proceeds”) of ForeFront Portfolio Policy No. J06635374 (the “Policy”) to or on behalf of the Movants [Docket No. 1507] (the “Motion”).

2. Objections to the Motion were to be filed and served no later than August 7, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”). The hearing for the Motion has been scheduled for August 14, 2025 at 10:00 a.m. (ET).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. As of the filing of this certificate, more than twenty-four (24) hours have elapsed since the Objection Deadline, and to the best of the knowledge of the undersigned counsel, no objection has been filed with the Court on the docket of the above-captioned chapter 11 cases, or served upon Movants or their counsel.²

4. Accordingly, Michael Prendergast and Jeffrey Dwyer, on behalf of all Movants, respectfully request entry of the Proposed Order attached to the Motion and attached hereto as **Exhibit A**.

[Signature page to follow]

² Advantus, Corp., Fairfield Processing Corp., Gwen Studios, LLC, Ormo Ithalat Ihracat A.S., Low Tech Toy Club LLC, and Springs Creative Products Group, LLC filed a statement in response to the Motion [Docket No. 1554] (the “Statement”). The Statement disagrees with certain characterizations made in the Motion but does not object to the relief sought.

Dated: August 13, 2025
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

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*Counsel to Michael Prendergast and Jeffrey
Dwyer*

CERTIFICATE OF SERVICE

I, Jody C. Barillare, hereby certify that on August 13, 2025, I caused to be served copies of the *Certificate of No Objection Regarding Motion of Michael Prendergast, Jeffrey Dwyer, Robert Will, Christopher Ditullio, Heather Holody, Michael Kennedy, and Melissa Bowers for Relief from the Automatic Stay, to the Extent Applicable, to Allow Payment And/or Advancement of Defense Costs and Related Expenses Under Insurance Policy* to all parties consenting to service through the Court's CM/ECF system.

Dated: August 13, 2025
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

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